

EX PARTE OR LATE FILED
BRYAN CAVE

ORIGINAL

ST. LOUIS, MISSOURI
LOS ANGELES, CALIFORNIA
NEW YORK, NEW YORK
PHOENIX, ARIZONA
KANSAS CITY, MISSOURI

700 THIRTEENTH STREET, N.W.
WASHINGTON, D.C. 20005-3960
(202) 508-6000
FACSIMILE: (202) 508-6200

IRVINE, CALIFORNIA
SANTA MONICA, CALIFORNIA
OVERLAND PARK, KANSAS
LONDON, ENGLAND
RIYADH, SAUDI ARABIA
FRANKFURT AM MAIN, GERMANY

CARL W. NORTHROP

DOCKET FILE COPY ORIGINAL

(202) 508-6152

June 14, 1993

RECEIVED

BY HAND DELIVERY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

JUN 14 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Notice of Ex Parte Contact
ET Docket No. 92-100

Dear Ms. Searcy:

On June 14, 1993, representatives of PacTel Paging (William Adler, Mark Stachiw, and Carl W. Northrop) met with Byron F. Marchant, Senior Legal Advisor to Commissioner Andrew C. Barrett, Randall Coleman, Legal Advisor to Commissioner Ervin S. Duggan, and Brian F. Fontes and Kathleen Q. Abernathy, Legal Advisors to Chairman James H. Quello, regarding ET Docket No. 92-100, the narrowband portion of the PCS proceedings. The presentation was consistent with PacTel Paging's publicly filed comments in the proceeding.

Pursuant to the Commission's rules, two copies of PacTel Paging's presentation are attached hereto.

Very truly yours,

Carl W. Northrop

**MEETING WITH
FEDERAL COMMUNICATIONS COMMISSION
STAFF**

JUNE 14, 1993

**PACTEL PAGING
Three Forest Plaza, Suite 800
Dallas, Texas 75251**

The Regional Plan

The Commission Need Not And Should Not Conclude That The Same Regional Licensing Scheme Is Appropriate For Narrowband And Wideband PCS.

- Narrowband and wideband services are different, as evidenced by the different industries from which the proponents come.
 - The principal advocates of narrowband PCS are major paging companies who recognize this as the appropriate technological evolution of messaging services.
- Existing paging systems have evolved in response to market demands to serve much larger regions than are typical for cellular systems, cable systems or landline telephone systems.
- Narrowband power limits are likely to be higher, so extended coverage will be easier to achieve at less cost.
 - Lower infrastructure costs for narrowband PCS than wideband PCS reduce the potential preclusive effect of larger territories.

The Spontaneous Industry Support For A Five Region Plan For



The Frequency Plan

Several Key Consensus Positions Emerged From The Comments On The Narrowband PCS Channel Plan

- A variety of bandwidths should be available to foster a diversity of narrowband PCS services.
 - Base to mobile channel assignments should not be very large (ie. > 150 KHz) or very small (i.e. less than 25 KHz).
 - Mobile to base channel assignments should not be too small to be split nor too large for the service (i.e., > 12.5 KHz but less than or equal to 25 KHz).
 - If possible, some of the mobile to base spectrum should be reserved for existing one-way paging licensees to allow them to provide advanced and more efficient services on existing allocations
- Some pairings should be symmetrical (ie. same bandwidth for base and mobile transmissions) and some should be asymmetrical (ie. return link with narrower bandwidth than base transmit channel).
 - A majority of narrowband services are likely to be asymmetrical, based upon developmental efforts.
- For technical reasons, the band 901 to 902 MHz should be reserved for low-powered return link communications.

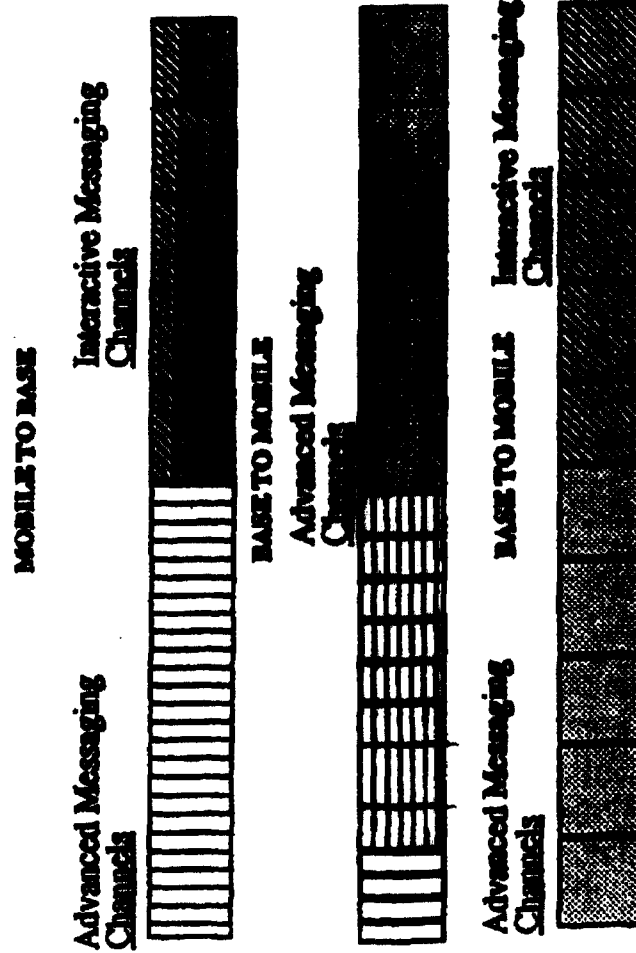
The PacTel Paging Narrowband PCS Channel Plan Meets the Stated Objectives

- **940 to 941 MHz** - Five unpaired 100 KHz advanced messaging channels and five paired 100 KHz interactive messaging channels.
- **930 to 931 MHz** - Four unpaired 25 KHz advanced messaging channels, eight unpaired 50 KHz advanced messaging channels and five unpaired 100 KHz advanced messaging channels.
- **901 to 902 MHz** - Twenty-five 20 KHz advanced messaging service channels available for pairing with base to mobile advanced messaging channels and five 100 KHz interactive messaging channels paired with base to mobile interactive messaging channels.

Some But Not All Plans Proposed By Others Meet The Stated Criteria

- The Motorola Plan shares many common elements with the PacTel Paging plan and would also meet these objectives.
- There is considerable support in the comments for channelization plans that focus on smaller rather than larger bandwidths: Arch Communications (100 KHz), Dial Page (50 KHz), Matsushita (50 KHz), MTEL (50 KHz), Southwestern Bell (25 or 50 KHz), Ericsson (50 KHz).
- Only two commenting parties (PageNet and PageMart) recommend maximum channel bandwidths of greater than 150 KHz.

Proposed Channel Scheme Narrow Band PCS Spectrum



901-902 MHz.

25, 20 KHz. Advanced Messaging Channels paired with base-to-mobile Advanced Messaging Channels. (Unused channels to be available to current one-way licensees.)
5, 100 KHz Interactive Messaging Channels paired with base-to-mobile Interactive Messaging Channels.

930-931 MHz.

5, 100 KHz Advanced Messaging Channels
8, 50 KHz Advanced Messaging Channels
4, 25 KHz Advanced Messaging Channels

940-941 MHz.

5, 100 KHz Advanced Messaging Channels
5, 100 KHz Interactive Messaging Channels